

KIRKLAND & ELLIS LLP
AND AFFILIATED PARTNERSHIPS

Devora W. Allon, P.C.
To Call Writer Directly:
+1 212 446 5967
devora.allon@kirkland.com

601 Lexington Avenue
New York, NY 10022
United States
+1 212 446 4800
www.kirkland.com

MEMO ENDORSED

Facsimile:
+1 212 446 4900

August 19, 2020

VIA ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

Re: *Geller Biopharm, Inc., v. Amunix Pharmaceuticals, Inc.*, Case No. 20 Civ. 4334 (KFP)
Opposition to Defendant's Request for a Pre-motion Conference

Dear Judge Failla:

We represent Plaintiff Geller Biopharm, Inc. ("GBP") in the above captioned matter. We respectfully seek leave to file under seal GBP's letter in opposition to Amunix's letter requesting a pre-motion conference for its motion to dismiss the complaint under Rule 12(b)(6).

At GBP's request, the Court has placed the complaint and certain accompanying exhibits under seal, given their confidential nature. (Dkt. No. 3). Additionally, at Defendant's request the Court has placed Defendant's pre-motion letter, which extensively discusses the contents of the sealed complaints and exhibits, under seal. GBP's letter in opposition to Defendant's pre-motion letter extensively discusses these sealed documents. Therefore, GBP respectfully requests leave to file its opposition letter under seal.

Respectfully submitted,

/s/ Devora W. Allon, P.C.
Devora W. Allon, P.C.
Vera C. Esses

Counsel for Plaintiff Geller Biopharm, Inc.

CC: All Counsel of Record via ECF

Application GRANTED.

Dated: August 19, 2020
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE